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## Wednesday, December 6, 2017 at 4:16:43 PM Atlantic Standard Time

Subject: Martínez-González v. Catholic Schools of the Archdioceses of San Juan Pension Plan

Date: Friday, December 1, 2017 at 12:10:34 PM Atlantic Standard Time

From: Carlos F. López

To: Jaime Luis Sanabria Montañez, Arturo V Bauermeister, jrabell@gmail.com, Frank Zorrilla, Eric Perez-

Ochoa, Lourdes Arroyo-Portela, Alexandra Casellas-Cabrera

**CC:** Francisco Amundaray, Instituto Ecocoop

Dear colleagues,

As you know, on July 31, 2017 plaintiffs filed a Motion to Compel Discovery (Dkt. 123) against all defendants. Accordingly, on August 28, 2017 we held a Rule 26 meeting to confer in good faith about a potential out-of-court solution to the our Motion to Compel. Since defendants failed to comply with the discovery requests we held a second Rule 26 meeting on August 30, 2017, where only defendant Catholic Schools of the Archdioceses of San Juan Pension Plan, the Superintendence of Catholic Schools of the Archdioceses of San Juan and plaintiffs attended. The parties present on said meeting reached an agreement as to the discovery issues between them.

The court denied <u>without prejudice</u> our Motion to Compel based upon the efforts to try to resolve the discovery issues without the intervention of the court.

As of today, none of the defendants have comply with the discovery requests stated in the Motion to Compel and/or the agreements reached in the Rule 26 meetings. Be that as it may, plaintiffs is requiring all defendants to comply with the discovery requests by next **Monday, December 4, 2017**. Failure to do so will force us to renew our Motion to Compel and seek all appropriate remedies.

Awaiting for your urgent attention to this matter, we remain,

Cordially

## CARLOS F. LOPEZ, ESQ.

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